UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

FERNALD
LOG C-0565

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FILE: 6446.6c9g

REPLY TO THE ATTENTION OF:

4082

JAN 16 2002

Mr. Johnny W. Reising
United States Department of Energy
Feed Materials Production Center
P.O. Box 398705
Cincinnati, Ohio 45239-8705

SRF-5J

RE: Waste Pit Liner PSP

Dear Mr. Reising:

The United States Environmental Protection Agency (U.S. EPA) has completed its review of the United States Department of Energy's (U.S. DOE) Project Specific Plan (PSP) for the Waste Pit remedial action project investigation of waste pit liners and liner subsurface material.

The PSP provides a plan for evaluating the nature and extent of contamination in the clay liners and the material below the liners of the waste pits.

Overall, U.S. EPA finds the document technically adequate, but advises U.S. DOE to proceed with extreme caution to prevent contamination of the Great Miami Aquifer, while proceeding with this PSP. U.S. EPA has enclosed comments on the document.

Therefore, U.S. EPA approves the PSP for waste pit remedial action investigation of waste pit liners and liner subsurface material.

Please contact me at (312) 886-0992 if you have any questions regarding this matter.

Sincerely,

James A. Saric
Remedial Project Manager
Federal Facilities Section
SFD Remedial Response Branch #2

Enclosure

cc: Tom Schneider, OEPA-SWDO
Kim Chaney, U.S. DOE-HDQ
John Bradburne, Fluor Fernald
Terry Hagen, Fluor Fernald
Tim Poff, Fluor Fernald

TECHNICAL REVIEW COMMENTS ON "PROJECT SPECIFIC PLAN FOR WASTE PITS REMEDIAL ACTION PROJECT INVESTIGATION OF WASTE PIT LINERS AND LINER SUBSURFACE MATERIAL"

FERNALD ENVIRONMENTAL MANAGEMENT PROJECT

SPECIFIC COMMENTS

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 2.1 Page #: 2-1 Line #: Not Applicable
Original Specific Comment #: 1
Comment: The text and the figures and table cited identify locations for ten proposed borings in the currently exposed portions of the floors of Waste Pits 1 and 3. Section 1.4 notes that additional borings are to be completed as more floor is exposed and that approval of the proposed locations for these borings are to be obtained through the Variance/Field Change Notice system. Section 2.1 should be expanded to provide guidance for selection of future boring locations in order to ensure adequate coverage of potentially contaminated areas. This guidance should include requirements for the maximum floor area to be evaluated using a given boring, the maximum distance between borings, and the minimum number of samples to be collected from each pit, as well as a general requirement for completion of additional, more closely spaced borings as necessary to define the extent of any contamination identified.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 2.2 Page #: 2-1 Line #: 17
Original Specific Comment #: 2
Comment: The text states that at each boring location, one composite sample will be collected from 4 feet of "subsurface material" below the clay liner and analyzed for dioxins and furans. Dioxins and furans have very low mobility, so they are most likely to be present in the uppermost soil material. In addition, compositing always raises the sample detection limit. Therefore, at a given boring location, if a clay liner is missing or very thin (for example, less than 2 feet thick), two subsurface samples should be collected and analyzed for dioxins and furans: one sample from the uppermost 1 foot and the other sample from the rest of the boring. This procedure would increase the probability of detecting low-concentration dioxin and furan contamination if it is present.

3